

IN THE UNITED STATES BANKRUPTCY COURT  
DISTRICT OF PUERTO RICO

IN RE: **PEDRO PABLO ALAMO RAMOS**  
SSN xxx-xx-8271

CASE NO: 22-00838-MCF

Debtor(s)

Chapter 13

TRUSTEE'S OBJECTION TO PROPOSED PLAN CONFIRMATION UNDER SECTION 1325

\*ATTORNEY FEES AS PER R 2016(b) STATEMENT:

Attorney of Record: **ROBERTO FIGUEROA CARRASQUILLO\***

Total Agreed: **\$4,000.00** Paid Pre-Petition: **\$302.00** Outstanding (Through the Plan): **\$3,698.00**

\*TRUSTEE'S POSITION RE CONFIRMATION UNDER U.S.C. §1325

**Debtor's/s' Commitment Period:**  Under Median Income 36 months  Above Median Income 60 months §1325(b)(1)(B)  
 The Trustee cannot determine debtor's/s' commitment period at this time. Projected Disposable Income: **\$0.00**

**Liquidation Value: \$0.00 Estimated Priority Debt: \$829.87**

**If the estate were liquidated under Chapter 7, nonpriority unsecured claims would be paid approximately \$0.00**

With respect to the (amended) Plan date: **Mar 28, 2022 (Dkt 4)** **Plan Base: \$10,500.00**

**The Trustee:**  **DOES NOT OBJECT**  **OBJECTS Plan Confirmation** Gen. Uns. Approx. Dist.: **0.00 %**

**The Trustee objects to confirmation for the following reasons:**

[1325(a)(6)] Insufficiently Funded – Plan funding insufficient to comply with plan scheduled distribution or no sufficient information to determine it.

Plan is insufficiently funded to pay secured claim filed by Oriental Bank.

[1325(a)(8)] DSO Payment Default – Debtor(s) is in default with post-petition DSO payments.

Debtor has failed to submit evidence of being current with his Domestic Support Obligation payments. Since the filing of the bankruptcy Debtor should have made two payments -- April and May 2022. He has only submitted evidence of the May payment.

Also, Debtor must continue to submit evidence of his DSO payments up to plan confirmation.

**CERTIFICATE OF SERVICE:** The Chapter 13 Trustee herewith certifies that a copy of this motion has been served via first class mail on the same date it is filed to: the DEBTOR(S), and to her/his/their attorney through CM-ECF notification system.

/s/ Jose R. Carrion, Esq.  
**CHAPTER 13 TRUSTEE**  
PO Box 9023884, San Juan PR 00902-3884  
Tel. (787)977-3535 Fax (787)977-3550

Date: May 27, 2022

/s/ Alexandra Rodriguez, Esq.

